

KREINDLER & KREINDLER LLP**MEMO ENDORSED**

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January 15, 2016

Honorable Frank Maas
United States Magistrate Judge for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Approved
J. Maas, USMJ,
1/18/16

Re: In re Terrorist Attacks on September 11, 2001, MDL 03-1570 (GBD) (FM)

Dear Judge Maas,

According to the Court's scheduling order, plaintiffs were to file any motion to compel discovery as to Yasin Kadi by today. Over the last two or three months, the PEC has been in contact with Mr. Kadi's counsel, Peter Salerno and Amy Rothstein of Salerno & Rothstein, who advised that they had hoped to provide us with voluminous document production before this deadline. They later indicated that the production was taking longer than they expected and that they would try to provide documents on a rolling basis with the first one to occur in early January 2016. Earlier this week Mr. Salerno indicated that they would not be able to meet that deadline either and expected to make the first of the rolling productions at the end of January, followed by another in March and complete all of it by April 30th. They requested the additional time for the production and plaintiffs consented in exchange for their consent to an extension of time in which plaintiffs would have to file any motions to compel if needed. Plaintiffs do not know how many pages will be contained in the production, nor what languages they will be in, and will need sufficient time to review them once they are produced. Both parties agreed.

Accordingly, plaintiffs respectfully request an extension of time in which to file any motion to compel as to Kadi to be made 60 days after the completed production which would be June 30, 2016.

Respectfully submitted,

KREINDLER & KREINDLER LLP

/s/ Andrew J. Maloney III

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AJM/gm

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